UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

ARTHUR PAUL PRICE

Debtor : CHAPTER 13

:

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant : CASE NO. 5-24-bk-03095

:

ARTHUR PAUL PRICE :

Respondent :

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 10th day of February 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

- 1. Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid -100%.

WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s)' Plan.
- b. Dismiss or convert Debtor(s)' case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036

(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 10th day of February 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the Unites States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

PAUL MURPHY-AHLES ESQUIRE DETHLEFS, PYKOSH & MURPHY 2132 MARKET STREET CAMP HILL, PA 17011-

/s/Tammy Life

Office of Jack N. Zaharopoulos Standing Chapter 13 Trustee